

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
IN RE LERNOUT & HAUSPIE  
SECURITIES LITIGATION  
\_\_\_\_\_

CIVIL ACTION NO.  
00-11589 (PBS)

\_\_\_\_\_  
THIS DOCUMENT RELATES TO:  
ALL ACTIONS  
\_\_\_\_\_

**AFFIDAVIT OF LAKEETA M. KING IN SUPPORT OF CLASS PLAINTIFFS’  
MOTION TO MODIFY THIS COURT’S DECEMBER 22, 2004 ORDER AND  
FINAL JUDGMENT**

I, Lakeeta M. King, being duly sworn, declare as follows:

1. I am a Claims Administration Supervisor in A.B. Data, Ltd.’s Class Action and Complex Litigation Support Services Division (“A.B. Data”) in Milwaukee, Wisconsin. A.B. Data offers a full range of class action and complex litigation support services. My business address is 4057 North Wilson Drive, Milwaukee, Wisconsin 53211. My telephone number is (414) 963-6445.

2. I submit this Affidavit in support of Class Plaintiffs’ motion to modify this Court’s December 22, 2004 Order And Final Judgment in the consolidated action entitled *In re Lernout & Hauspie Securities Litigation*, Civil Action No. 00-11589 (PBS), United States District Court, District of Massachusetts, at the request of the Plaintiffs’ Counsel. This Affidavit updates my December 16, 2004 Supplemental Affidavit regarding Requests for Exclusion.

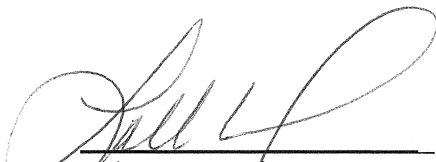
Affidavit of Lakeeta M. King

*In re Lernout & Hauspie Securities Litigation*, Civil Action No. 00-11589 (PBS)

3. This Affidavit is based upon my personal knowledge and upon information provided by Plaintiffs' Counsel, my associates, and staff.

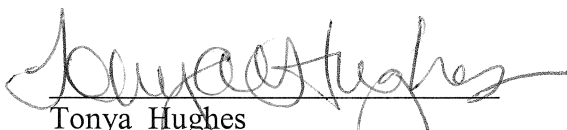
4. During claims processing, A.B. Data, Ltd. uncovered three (3) complete and timely Requests For Exclusion (representing 1050 shares) that were not included in my December 16, 2004 Supplement Affidavit. As such, these three individuals, were not excluded from the settlement pursuant to this Court's December 22, 2004 Order And Final Judgment. Copies of these valid requests for exclusion have been attached as Exhibit 1.

I declare under penalty of perjury that the foregoing is true and correct. If called as a witness, I could and would competently testify thereto.

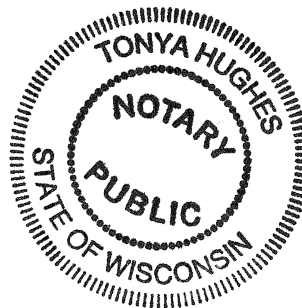
  
Lakeeta M. King

Date: May 2, 2005

SUBSCRIBED and SWORN before me on the 2 day of May 2005.

  
Tonya Hughes  
Notary Public – State of Wisconsin

My commission is permanent



Affidavit of Lakeeta M. King

*In re Lernout & Hauspie Securities Litigation*, Civil Action No. 00-11589 (PBS)

# Exhibit 1

KPMG – Lernout & Hauspie Securities  
Litigations Exclusions,  
c/o A.B. Data LTd.,  
P.O. Box 170500,  
MILWAUKEE, WI 53217

RECEIVED

NOV 29 2004

UNITED STATES OF AMERICA

Date: 25-11-2004

Dear Madame,  
Dear Sir,

Conc.: Exclusion from the Class

I hereby formally requests exclusion from the Class in the KPMG - Lernout & Hauspie Securities Litigation, Civil Action No. 00-CV-11589.

Enclosed I provide you with the date(s), price(s), and number(s) of shares, call options or put options of all purchases and sales of L&H during the period 28 April 1998 and 9 November 2000 (see annexes).

Sincerely yours,

Dens R  
Signature

Dens Raimbault  
Name

JEENWINKEL STR 389 (Street and house number)  
2627 SCHELLE (Postal Code and City)  
BELGIE (Country)  
Address

0496 53 55 22  
Phone number

Annex 1- Purchases of L&H common stock on NASDAQ between 28/04/1998 and 9/11/2000 (inclusive)



[illegible]

**Annex 3—Purchases of Call Options contracts on L&H common stock between 28/04/1998 and 9/11/2000 (inclusive) on an United States-Based Options Exchange**

<u>Date of Purchase</u> (chronologically)	<u>Number of Call Option Contracts</u>	<u>Expiry Month and Year</u> (XX/XX)	<u>Strike Price in USD</u>	<u>Purchase Price Per Call Option Contract in USD</u>	<u>Enter 'E' if Exercised; 'X' if Expired; or 'S' when sold</u>	<u>Exercise or Expiration Date</u>

[illegible]

**Annex 6—Purchases of Put Options contracts on L&H common stock between 28/04/1998 and 9/11/2000 (inclusive) on a United States-Based Options Exchange**

[illegible]

[illegible]

**Annex 5—Sales of Put Options contracts on L&H common stock between 28/04/1998 and 9/11/2000 (inclusive) on a United States-Based Options Exchange**

[illegible]



[illegible]

**Annex 4—Sales of Call Options contracts on L&H common stock between 28/04/1998 and 9/11/2000 (inclusive) on a United States-Based Options Exchange**

[illegible]





KPMG - Lernoud & Houssier Securities  
Litigations Exclusions.  
c/o A.B. Nator Ltd.,  
P.O. Box 170500  
MILWAUKEE, WI 53217  
UNITED STATES OF AMERICA.



KPMG – Lernout & Hauspie Securities  
Litigations Exclusions,  
c/o A.B. Data LTd.,  
P.O. Box 170500,  
MILWAUKEE, WI 53217

UNITED STATES OF AMERICA

Date: december 1<sup>st</sup> 2004,

Dear Madame,  
Dear Sir,

Conc.: Exclusion from the Class

I hereby formally requests exclusion from the Class in the KPMG - Lernout & Hauspie Securities Litigation, Civil Action No. 00-CV-11589.

Enclosed I provide you with the date(s), price(s), and number(s) of shares, call options or put options of all purchases and sales of L&H during the period 28 April 1998 and 9 November 2000 (see annexes).

Sincerely yours,

Signature

VAN HOLLEBEKE Eduard  
Name

PARKLANN 135 (Street and house number)

2300 TURNHOUT (Postal Code and City)

BELGIUM (Country)

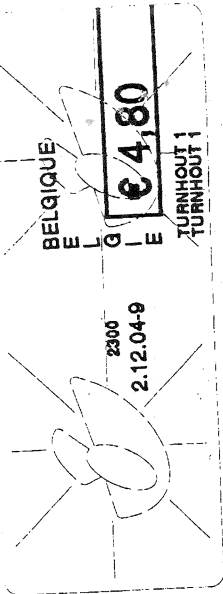
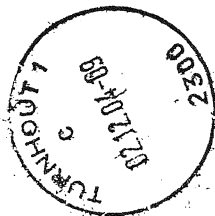
Address

(32) 14928148  
Phone number



**A** PRIOR ✈

**R** RR 759 00745 3 BE



**RECEIVED**

**NOV 30 2004**

**KPMG – Lernout & Hauspie Securities  
Litigations Exclusions,  
c/o A.B. Data LTd.,  
P.O. Box 170500,  
MILWAUKEE, WI 53217**

**UNITED STATES OF AMERICA**

November 23, 2004.

Dear Madame,  
Dear Sir,

Conc.: Exclusion from the Class

I hereby formally requests exclusion from the Class in the KPMG - Lernout & Hauspie Securities Litigation, Civil Action No. 00-CV-11589.

Enclosed I provide you with the date(s), price(s), and number(s) of shares, call options or put options of all purchases and sales of L&H during the period 28 April 1998 and 9 November 2000 (see annexes).

Sincerely yours,



Patrick Faes

Vaartkant links 5  
B-2960 St.-Lenaarts  
Belgium

☎ + 32 (0) 3 313.96.39

**Annex 1 – Purchases of L&H common stock on NASDAQ between 28/04/1998 and 9/11/2000**  
**(inclusive)**

[illegible]

FAES PATRICK  
Te verrekenen bedragen  
Effectendossier

311053/404.000.001  
311053/000

Nij hebben voor u GEKOCHT te - New York -  
op datum van 20.04.00 volgende effecten :

LERNOUT & HAUSPIE  
ISIN code : BE 015728548 8

20	aan	98,00000	USD	1.960,00	USD
	MAKELAARSLOON			29,50	USD
	BEURSTAKS			3,33	USD
	TOTAAL NETTO.....			1.992,83	USD
	Wisselkoers	43,160229			
	DEBET.....			86.011,00	BEF VAL. 26.04.00

193000420

31 al betaalde taks. - Ministeriële vergunning van 10-01-1992, nr. E.T.T. 720

FAES PATRICK  
EDR 311053

ANTWERPEN, 25.05.00

BORDEREL 120-8571517

UW AANKOOP

25.05.00

New York

30 LERNOUT & HAUSPIE aan 39,87500 USD

1.196,25 USD

MAKELAARSLOON  
BEURSTAKS  
TOTAAL NETTO

29,50 USD  
2,03 USD  
1.227,78 USD

TOTAAL NETTO DEBET  
VALUTA 31.05.00

1 USD = 55.115,00 B  
44,889964 B

Wanneer u uw rekening provisioneert, doe dit dan steeds met mededeling  
+++031/1053/000/93+++

Globaal betaalde taks. - Ministeriële vergunning van 10-01-1992, nr. E.T.T. 720

FAES PATRICK  
EDR 311053

ANTWERPEN, 10.08.00

KBC  
Securities

BORDEREL 120-9033900

UW AANKOOP

10.08.00

New York

60 LERNOUT & HAUSPIE aan 28,00000 USD

2.240,00 USD

MAKELAARSLOON  
BEURSTAKS  
TOTAAL NETTO

29,50 USD  
3,81 USD  
2.273,31 USD

TOTAAL NETTO DEBET  
VALUTA 15.08.00

1 USD = 101.594,00 BEF  
44,689901 BEF

provisioneert, doe dit dan steeds met mededeling